

August 2, 1999

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Chairman, WJDR Enterprises

Federal Communications Commission
445 12th Street SW
Washington, DC 20554
Re: MM Docket #99-25

To the Commissioners:

We feel compelled to register our concerns with, and state our opposition to, the current Commission proposal on Low Power FM (LPFM). The issue is not about blocking additional voices from reaching the air. We, after all, represent diverse viewpoints and programming that is an alternative to commercial radio. The real issue is the fundamental flaws in this proposal:

- **This is not a one station, one market, one owner policy.** As presently written, one organization could own multiple LPFMs in multiple markets and service all of them with a single, satellite delivered signal. We do not believe this serves the objective of bringing community-oriented localism back to the nation's airwaves.
- **There is no realistic plan to protect the signal integrity of existing stations.** Instead, the Commission suggests it may relax or eliminate the 2nd and 3rd adjacency protections which WYSO and other FM broadcasters currently enjoy. Under this proposal, our protected coverage area would be significantly scaled back, while the rest of our signal area would potentially face other, unforeseen, signal integrity problems.
- **It is unclear if LPFM and IBOC digital FM transmission systems are compatible.** It seems like a terrible legacy if the FCC takes steps now that would inhibit radio's ability to convert to digital in the near future.

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- **It is unlikely that this expansion can be managed to protect the public interest.** The Commission does not address how it plans to cope with the oversight issue, but the Commission has previously acknowledged its difficulty in adequately overseeing the stations it currently licenses. How will it deal with all of these new stations?

The technical and structural flaws in this proposal threaten the ability of licensees to continue to serve their audiences. The proposal will be difficult to manage and may unduly complicate the conversion to digital broadcasting. Finally, there is no assurance that this proposal will open access for voices not often heard. We urge you to reject this proposal.

Sincerely,

The WYSO Resource Board

cc: Sen. Mike DeWine
Sen. George Voinovich
Rep. David Hobson